

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

FREEDOM FROM RELIGION	§	
FOUNDATION, INC., JANE DOE,	§	
JOHN ROE, and JANE NOE,	§	
<i>Plaintiffs,</i>	§	Civil Action No. 4:17-cv-881
	§	
v.	§	
	§	
	§	
JUDGE WAYNE MACK, in his official	§	
capacity as Justice of the Peace, and	§	
MONTGOMERY COUNTY, TEXAS,	§	
<i>Defendants.</i>	§	

**DEFENDANTS' UNOPPOSED MOTION  
FOR EXTENSION OF EXPERT DESIGNATION DEADLINE**

Defendants respectfully request a fourteen (14) day extension of their deadline to designate experts. Relevant dates are set forth below:

1. On January 10, 2018, the Court issued an Amended Docket Control Order (Dkt. No. 51), which set deadlines of March 25, 2018 for Plaintiffs to designate their expert witnesses and May 25, 2018 for Defendants to designate their expert witnesses.
2. On March 27, 2018, the Court granted Plaintiffs' request for a seven-day extension of their expert designation deadline. Plaintiffs served their expert designations on March 30, 2018.
3. Defendants seek a fourteen-day extension of their expert designation deadline, through and until June 8, 2018. Plaintiffs do not oppose this motion or the relief sought. A proposed order extending Defendants' deadline is attached.

Respectfully submitted,

**J.D. LAMBRIGHT,  
COUNTY ATTORNEY**

B.D. Griffin  
Assistant County Attorney  
Texas Bar No. 08468500  
S.D. Texas Bar No. 1862  
Adam Anderson  
Texas Bar No. 24090780  
S.D. Texas Bar No. 2914958  
501 North Thompson, Suite 300  
Conroe, TX 77301  
(936) 539-7828  
(936) 760-6920 (facsimile)  
bd.griffin@mctx.org  
adam.anderson@mctx.org

**BAKER BOTTS L.L.P.**

By: /s/ Amy Pharr Hefley  
Aaron M. Streett  
Texas Bar No. 24037561  
S.D. Texas Bar No. 732596  
Amy Pharr Hefley  
Texas Bar No. 24046046  
Nischay Bhan  
Texas Bar No. 24105468  
S.D. Texas Bar No. 3151238  
One Shell Plaza  
910 Louisiana St.  
Houston, TX 77002  
(713) 229-1234  
(713) 229-1522 (facsimile)  
aaron.streett@bakerbotts.com  
amy.hefley@bakerbotts.com  
nischay.bhan@bakerbotts.com

Vincent Wagner  
Texas Bar No. 24093314  
S.D. Texas Bar No. 3162395  
2001 Ross Avenue, Suite 700  
Dallas, TX 75201  
(214) 953-6000  
(214) 661-6503 (facsimile)  
vincent.wagner@bakerbotts.com

COUNSEL FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I certify that this document was filed with the Court's Electronic Filing System, which will serve all known Filing Users, on May 11, 2018.

/s/ Amy Pharr Hefley

Amy Pharr Hefley